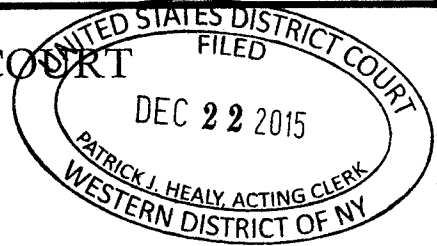


UNITED STATES DISTRICT COURT

for the
Western District of New York



In the Matter of the Search of
(Briefly describe the property to be searched or identify the person by name and address.)

Facebook Account: Haywood Jay,
Facebook User ID: 100004975687834,
which information is stored at premises
owned, maintained, controlled, or operated
by Facebook Inc., a company headquartered
at 1 Hacker Way, Menlo Park, California, 94025,
more further described in Attachment A.

Case No. 15-MJ- 4208

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer, request a search warrant and state under penalty of perjury that I have reason to believe that there is now concealed on the following person or property located in the Western District of New York (identify the person or describe property to be searched and give its location): Facebook Account: Haywood Jay, Facebook User ID: 100004975687834, which information is stored at premises owned, maintained, controlled, or operated by Facebook Inc., a company headquartered at 1 Hacker Way, Menlo Park, California, 94025, more further described in Attachment A.

The person or property to be searched, described above, is believed to conceal (identify the person or describe the property to be seized): See Attachment B for the Items to be Seized, all of which are fruits, evidence and instrumentalities of violations of Title 18 United States Code, Sections 2251(a), 2251(e), and 2252A(a)(5)(B), as set for in the attached affidavit, and all of which are more fully described in the application and affidavit filed in support of this warrant, the allegations of which are adopted and incorporated by reference as if fully set forth herein.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of 18 U.S.C. §§ 2251(a), 2251(e), and 2252A(a)(5)(B), and the application is based on these facts which are continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Nicholas Peruzzini, S/A HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/22/15

Marian W Payson

Judge's signature

City and state: Rochester, NY

Hon. Marian W. Payson, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

DESCRIPTION OF ITEM/ITEMS TO BE SEARCHED

This warrant applies to information associated with

Facebook Account: Haywood Jay

Facebook User ID: 100004975687834

The information is stored at premises owned, maintained, controlled, or operated by Facebook Inc., a company headquartered at 1 Hacker Way, Menlo Park, California, 94025.

ATTACHMENT B

DESCRIPTION OF ITEMS TO BE SEIZED

I. Information to be disclosed by Facebook

To the extent that the information described in is within the possession, custody, or control of Facebook Inc. ("Facebook"), including any messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(t), Facebook is required to disclose the following information to the government for the user ID listed in Attachment A:

(a) All contact and personal identifying information, including full name, user identification number, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers.

(b) All activity logs for the account and all other documents showing the user's posts and other Facebook activities;

(c) All photos and videos uploaded by that user ID and all photos and videos uploaded by any user that have that user tagged in them;

(d) All profile information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Facebook applications;

(e) All other records of communications and messages made or received by the user, including all private messages, chat history, video calling history, and pending "Friend" requests;

(f) All "check ins" and other location information;

(g) All IP logs, including all records of the IP addresses that logged into the account;

- (h) All records of the account's usage of the "Like" feature, including all Facebook posts and all non-Facebook webpages and content that the user has "liked";
- (i) All information about the Facebook pages that the account is or was a "fan" of;
- (j) All past and present lists of friends created by the account;
- (k) All records of Face book searches performed by the account;
- (l) All information about the user's access and use of Face book Marketplace;
- (m) The types of service utilized by the user;
- (n) The length of service (including start date) and the means and source of any payments associated with the service (including any credit card or bank account number);
- (o) All privacy settings and other account settings, including privacy settings for individual Facebook posts and activities, and all records showing which Facebook users have been blocked by the account;
- (p) All records pertaining to communications between Facebook and any person regarding the user or the user's Facebook account, including contacts with support services and records of actions taken.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of evidence of violations of Title 18, United States Code, Sections 2251(a) and 2251(e); and Title 18, United States Code, Section 2252A(a)(5)(B) for the user identified in Attachment A, pertaining to the following matters:

- (a) The production of images depicting child exploitation or child pornography
- (b) The identity of the person(s) who communicated with the user ID about matters relating to the trade of images depicting child exploitation or child pornography

15-mj-4208

**AFFIDAVIT IN SUPPORT
OF A SEARCH WARRANT**

STATE OF NEW YORK)
COUNTY OF MONROE)
CITY OF ROCHESTER)

I, Nicholas M. Peruzzini, being duly sworn, depose and state the following:

1. I am a Special Agent with Homeland Security Investigations (HSI) within the Department of Homeland Security, assigned to the office of the Special Agent in Charge, Buffalo New York, and have been so employed since February 2007. As part of my duties as a Special Agent with HSI, I investigate criminal violations relating to child exploitation and child pornography, including the illegal distribution, receipt and possession of child pornography, in violation of Title 18, United States Code, Sections 2252 and 2252A. I have received specialized training in the area of child pornography and child exploitation, and I have had the opportunity to observe and review numerous examples of child pornography, as defined in Title 18, United States Code, Section 2256.
2. I make this affidavit in support of an application for a search warrant for information associated with a certain Facebook user ID that is stored at premises owned, maintained, controlled, or operated by Facebook Inc. ("Facebook"), a social networking company headquartered in Menlo Park, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Facebook to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the user ID.
3. As set forth in more detail below, there is probable cause to believe that evidence, contraband, fruits and instrumentalities of violations of Title 18, United States Code, Sections 2251(a) and 2251(e) (production of child pornography); Title 18, United States Code, United States Code, Section 2252A(a)(5)(B) (possession of child pornography) are located within the Facebook Account "Haywood Jay" Facebook User ID: 100004975687834, herein referred to as the **SUBJECT ACCOUNT**.
4. The statements contained in this affidavit are based upon my investigation, information provided to me by other law enforcement personnel, and on my experience and training as a special agent of HSI. Because this affidavit is being submitted for the limited purpose of establishing probable cause to secure a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe are necessary to establish probable cause to believe that evidence of violations of Title 18, United States Code, Section 2251(a) and 2251(e); and Title 18, United States Code, Section 2252A(a)(5)(B) is presently located within the **SUBJECT ACCOUNT**.

RELEVANT STATUTES

5. Pursuant to the provisions of Title 18, United States Code, section 2252A(a)(5)(B), it is a federal crime for any person to knowingly possess child pornography and knowingly access with intent to view, any material that contains images of child pornography that have been mailed or, using any means or facility of interstate or foreign commerce, have been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer and that the images were produced using materials that have been mailed, shipped or transported in or affecting interstate of foreign commerce by any means including computer..
6. Pursuant to Title 18, United States Code, Section 2703(b), the contents of an electronic communication that is in electronic storage in an electronic communications system for more than 180 days may be obtained "pursuant to a warrant issued using the procedures described in the Federal Rules of Criminal Procedure by a court with jurisdiction over the offense under investigation..." (emphasis added). Further, pursuant to Title 18, United States Code, Section 2703(b)(1)(A), where such a warrant is obtained, no notice to the subscriber or customer is required to be given.

TRAINING AND EXPERIENCE

7. Based on your affiant's knowledge and experience as set forth herein, your affiant knows that persons who have an interest in engaging in illicit sexual conduct with children and who possess child pornography keep, store, share, and maintain images of child pornography. These individuals use sophisticated social media networks such as Facebook to communicate with co-conspirators and others involved in the child pornography business. Your affiant also knows that the review of the instant messaging history, comments, posts, address book, and "wall postings" can be stored within a Facebook account and can provide significant evidentiary value.
8. Face book owns and operates a free-access social networking website of the same name that can be accessed at <http://www.facebook.com>. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the general public.
9. Facebook asks users to provide basic contact and personal identifying information to Facebook, either during the registration process or thereafter. This information may include the user's full name, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers (for password retrieval), physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Facebook also assigns a user identification number to each account.

10. Facebook users may join one or more groups or networks to connect and interact with other users who are members of the same group or network. Facebook assigns a group identification number to each group. A Facebook user can also connect directly with individual Facebook users by sending each user a "Friend Request." If the recipient of a "Friend Request" accepts the request, then the two users will become "Friends" for purposes of Facebook and can exchange communications or view information about each other. Each Facebook user's account includes a list of that user's "Friends" and a "News Feed," which highlights information about the user's "Friends," such as profile changes, upcoming events, and birthdays.
11. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook users, or to anyone with access to the Internet, including people who are not Facebook users. A Facebook user can also create "lists" of Facebook friends to facilitate the application of these privacy settings. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.
12. Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post "status" updates about their whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet. Facebook users can also post information about upcoming "events," such as social occasions, by listing the event's time, location, host, and guest list. In addition, Facebook users can "check in" to particular locations or add their geographic locations to their Facebook posts, thereby revealing their geographic locations at particular dates and times. A particular user's profile page also includes a "Wall," which is a space where the user and his or her "Friends" can post messages, attachments, and links that will typically be visible to anyone who can view the user's profile.
13. Facebook allows users to upload photos and videos. It also provides users the ability to "tag" (i.e., label) other Facebook users in a photo or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link to see the photo or video. For Facebook's purposes, the photos and videos associated with a user's account will include all photos and videos uploaded by that user that have not been deleted, as well as all photos and videos uploaded by any user that have that user tagged in them.
14. Facebook users can exchange private messages on Facebook with other users. These messages, which are similar to e-mail messages, are sent to the recipient's "Inbox" on Facebook, which also stores copies of messages sent by the recipient, as well as other information. Facebook users can also post comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile. In addition, Facebook has a Chat feature that

allows users to send and receive instant messages through Facebook. These chat communications are stored in the chat history for the account. Facebook also has a Video Calling feature, and although Facebook does not record the calls themselves, it does keep records of the date of each call.

15. If a Facebook user does not want to interact with another user on Facebook, the first user can "block" the second user from seeing his or her account.
16. Facebook has a "like" feature that allows users to give positive feedback or connect to particular pages. Facebook users can "like" Facebook posts or updates, as well as webpages or content on third-party (i.e., non-Facebook) websites. Facebook users can also become "fans" of particular Facebook pages.
17. Facebook has a search function that enables its users to search Facebook for keywords, usernames, or pages, among other things.
18. Each Facebook account has an activity log, which is a list of the user's posts and other Facebook activities from the inception of the account to the present. The activity log includes stories and photos that the user has been tagged in, as well as connections made through the account, such as "liking" a Facebook page or adding someone as a friend. The activity log is visible to the user but cannot be viewed by people who visit the user's Facebook page.
19. Facebook Notes is a blogging feature available to Facebook users, and it enables users to write and post notes or personal web logs ("blogs"), or to import their blogs from other services, such as Xanga, LiveJournal, and Blogger.
20. The Facebook Gifts feature allows users to send virtual "gifts" to their friends that appear as icons on the recipient's profile page. Gifts cost money to purchase, and a personalized message can be attached to each gift. Facebook users can also send each other "pokes," which are free and simply result in a notification to the recipient that he or she has been "poked" by the sender.
21. Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.
22. In addition to the applications described above, Facebook also provides its users with access to thousands of other applications on the Facebook platform. When a Facebook user accesses or uses one of these applications, an update about that the user's access or use of that application may appear on the user's profile page.
23. Some Facebook pages are affiliated with groups of users, rather than one individual user. Membership in the group is monitored and regulated by the administrator or head of the group, who can invite new members and reject or accept requests by users to enter. Facebook can identify all users who are currently registered to a

particular group and can identify the administrator and/or creator of the group. Facebook uses the term "Group Contact Info" to describe the contact information for the group's creator and/or administrator, as well as a PDF of the current status of the group profile page.

24. Facebook uses the term "Neoprint" to describe an expanded view of a given user profile. The "Neoprint" for a given user can include the following information from the user's profile: profile contact information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Facebook applications.
25. Facebook also retains Internet Protocol ("IP") logs for a given user ID or IP address. These logs may contain information about the actions taken by the user ID or IP address on Facebook, including information about the type of action, the date and time of the action, and the user ID and IP address associated with the action. For example, if a user views a Facebook profile, that user's IP log would reflect the fact that the user viewed the profile, and would show when and from what IP address the user did so.
26. Social networking providers like Facebook typically retain additional information about their users' accounts, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account number). In some cases, Facebook users may communicate directly with Facebook about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Facebook typically retain records about such communications, including records of contacts between the user and the provider's support services, as well as records of any actions taken by the provider or user as a result of the communications.
27. Therefore, the computers of Facebook are likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of Facebook, such as account access information, transaction information, and other account information.

PROBABLE CAUSE

Sexual Abuse of CHILD

28. On September 13, 2005, Brandon S. WEST was convicted in the State of New York of Deviate Sexual Intercourse – Sexual contact with a Female victim under age 9.
29. On September 23, 2014, the New York State Police (NYSP) were contacted by Wayne County Child Protective Services (CPS). CPS advised NYSP that they had been assigned a case regarding the possible sexual abuse of a five year old female child. The victim was identified as a 5 year old, hereafter known as Female Minor Victim (CHILD).
30. On September 24, 2014 investigators from NYSP and CPS interviewed CHILD at her Elementary School. CHILD indicated that she lived with her mother, brother, grandmother and grandfather. CHILD advised that her mother's boyfriend named "West" moved out of the home as he was being rude to her mother. CHILD indicated that sometime WEST would hit her. CHILD then disclosed that WEST "plays with hers" and pointed to her crotch. CHILD stated that WEST touches her "pirate seat" and advised he did this when she was wearing clothes by touching her inside her underwear.
31. CHILD further stated that sometimes WEST wanted her to take off her underwear. CHILD disclosed this happened at her grandmother's house in her mother's room. She stated WEST called her a "meanie" and would use his finger. When asked what WEST would do with his finger CHILD stated "He put his finger in his mouth then put it in my "put poe" and pointed to her crotch. CHILD further stated she went into her mother's room one time and saw WEST doing the same thing to her mother. CHILD advised WEST has never touched her with any other objects but reported he asked her to touch him on his privates. When asked what his privates were she stated "the thing you suck the pee out of". CHILD indicated she saw WEST's penis before and that WEST wanted her to suck on his private when she told him no.
32. On September 24, 2014, investigators from NYSP and CPS interviewed HR, the mother of CHILD. HR identified the subject CHILD referred to as "West" as Brandon WEST, her ex-boyfriend. HR reported that she and WEST broke up in July of 2014 after a domestic incident. HR told investigators that she was aware that West was a registered sexual offender but that he told her he could be around children and she believed him.
33. On September 24, 2014 investigators from NYSP and CPS interviewed KG, the mother of HR and grandmother to CHILD. KG advised investigators that WEST had not been living in her home since July when he and HR got into a domestic dispute and he moved out. KG stated that WEST would be left alone with the children on occasion when he lived in the home.

34. On November 10, 2014, CHILD attended a counseling session. During this session CHILD again made verbal disclosures that Brandon WEST had subjected her to sexual contact. CHILD made disclosures that WEST had inserted his finger into her vagina. CHILD additionally made disclosures that suggested WEST had engaged in oral sex with her.

The ICAC Referral

35. On December 8, 2014, NYSP received an investigative referral related to a child exploitation investigation. The referral included copies of images of suspected child pornography.
36. On October 20, 2015, your affiant received and reviewed the compact disc containing information related to the images found in the e-mail search warrant. The images appear to depict the 5 year old CHILD referenced above, and are sexually explicit within the definition of Title 18, United States Code, Section 2256.
37. Among the images reviewed by your affiant;
- a. File Name: 0410141010.jpg
Date/Time picture was taken: 2014-04-10 10:10:13
Description of Picture: Prepubescent female, laying down, wearing blue shirt and pink underwear. She is pulling underwear to the side to display her vagina.
 - b. File Name: 1118130956e.jpg
Date/Time picture was taken: 2013-11-18 09:56:42
Description of Picture: Prepubescent female laying on blue/green bed sheet, displaying vagina and anus. Child is using her fingers to spread her vagina open. Child is wearing pink/red clothing. Face is visible.
 - c. File Name: 1118130956e_2.jpg
Date/Time picture was taken: 2013-11-18 09:56:13
Description of Picture: Prepubescent female laying on blue/green bed sheet, displaying vagina and anus. Child is using her hands to spread anus open.

Identifying the Child in the images

38. Some of the photographs described in paragraphs 37 a-c above were sanitized to remove the sexually explicit portions, and were then shown to HR and KG by NYSP investigators on October 7, 2015. Both HR and KG identified items from the photographs to include CHILD.

39. Specifically;

- a. File Name: Sanitized version of 0410141010.jpg
HR indicated she recognized the nightgown in the photo, while KG said the child's hands in the photo looked like they were CHILD's hands.
- b. File Name: Sanitized version of 1118130956e.jpg
HR said that was her daughter, CHILD, in pajamas, and further identified the blue blanket visible in the photograph. KG told investigators that the photo showed CHILD in her "Christmas nightgown" and was taken on HR's bed.
- c. File Name: Sanitized version of 1118130956e_2.jpg
HR told investigators that the photo was taken in her bedroom. KG also recognized HR's bed spread in the photo and said the photo was taken in HR's bedroom.

40. Other images were also identified by HR and KG.

Search of WEST's cell phone

41. On May 5, 2015, Brandon S. WEST was arrested on unrelated charges in Wayne County. He was sentenced on the same date to 184 days incarceration. At the time of his arrest, he was in possession of a Verizon LG Brand Cellular Telephone, black in color, with a rear facing camera. The words "Verizon" and "LG" are present on the front of the phone. The cellphone was taken from WEST at booking by deputies from the Wayne County Sheriff's Office Corrections. The phone was in the custody of Wayne County Sheriff's Office Corrections since May 5, 2015 and had not been accessed or altered.
42. On October 27, 2015, a federal search warrant for the cellular telephone turned in by Brandon WEST was issued in the Western district of New York. The cell phone was seized by Homeland Security Investigations on the same date.
43. On October 28, 2015 a forensic examination of the cellular telephone was conducted by HSI agents. Two (2) sexually explicit images of CHILD were observed during this examination. Along with other sexually explicit images of children within the definition of Title 18, United States Code, Section 2256. Specifically, your affiant observed;
 - a. File Name: .thumbdata3--1967290299_embedded_89
Description of Picture: Prepubescent female laying on blue/ green bed sheet, displaying vagina and anus. Child is using her fingers to spread her vagina open. Child is wearing pink/red clothing. Face is visible.

b. File Name: .thumbdata3--1967290299_embedded_127

Description of Picture: Prepubescent female laying on blue/ green bed sheet, displaying vagina and anus. Child is using her hands to spread anus open.

44. Your affiant also observed sexually explicit images of other, unidentified children within the definition of Title 18, United States Code, Section 2256 within the defendant's cellular phone.
45. Your affiant also observed the Facebook Account "Haywood Jay" Facebook User ID: 100004975687834
46. On November 4, 2015, WEST was arrested for violation of 18 USC 2252A(a)(5)(B), Possession of Child Pornography. At the time of his arrest WEST stated that his Facebook username was "Haywood Jay."
47. During the course of the investigation, your affiant interviewed friends and associates of WEST. One of these people, who had access to WEST'S "Haywood Jay" Facebook page, indicated that he/she observed photos of young children naked, or engaged in sexually explicit activity within WEST'S Facebook account.

INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED

48. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Facebook to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

CONCLUSION

49. Based on the facts of the investigation, coupled with my training and experience as an HSI Special Agent, as well as the combined training and experience of other law enforcement officers with whom I have had discussions, your affiant asserts that there is probable cause to believe that evidence of violations of Title 18, United States Code, Sections 2251(a) and 2251(e); and Title 18, United States Code, Section 2252A(a)(5)(B) will be located within the **SUBJECT ACCOUNT**.
50. This Court has jurisdiction to issue the requested warrant because it is "a court of competent jurisdiction" as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is "a district court of the United States ... that – has jurisdiction over the offense being investigated." 18 U.S.C. § 2423(c). Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.



Nicholas Peruzzini, Special Agent
Homeland Security Investigations

Sworn to and subscribed before me
this 22 day of December, 2015.



HONORABLE MARIAN W. PAYSON
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

DESCRIPTION OF ITEM/ITEMS TO BE SEARCHED

This warrant applies to information associated with

Facebook Account: Haywood Jay

Facebook User ID: 100004975687834

The information is stored at premises owned, maintained, controlled, or operated by Facebook Inc., a company headquartered at 1 Hacker Way, Menlo Park, California, 94025.

ATTACHMENT B

DESCRIPTION OF ITEMS TO BE SEIZED

I. Information to be disclosed by Facebook

To the extent that the information described in is within the possession, custody, or control of Facebook Inc. ("Facebook"), including any messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(t), Facebook is required to disclose the following information to the government for the user ID listed in Attachment A:

(a) All contact and personal identifying information, including full name, user identification number, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers.

(b) All activity logs for the account and all other documents showing the user's posts and other Facebook activities;

(c) All photos and videos uploaded by that user ID and all photos and videos uploaded by any user that have that user tagged in them;

(d) All profile information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Facebook applications;

(e) All other records of communications and messages made or received by the user, including all private messages, chat history, video calling history, and pending "Friend" requests;

(f) All "check ins" and other location information;

(g) All IP logs, including all records of the IP addresses that logged into the account;

- (h) All records of the account's usage of the "Like" feature, including all Facebook posts and all non-Facebook webpages and content that the user has "liked";
- (i) All information about the Facebook pages that the account is or was a "fan" of;
- (j) All past and present lists of friends created by the account;
- (k) All records of Face book searches performed by the account;
- (l) All information about the user's access and use of Face book Marketplace;
- (m) The types of service utilized by the user;
- (n) The length of service (including start date) and the means and source of any payments associated with the service (including any credit card or bank account number);
- (o) All privacy settings and other account settings, including privacy settings for individual Facebook posts and activities, and all records showing which Facebook users have been blocked by the account;
- (p) All records pertaining to communications between Facebook and any person regarding the user or the user's Facebook account, including contacts with support services and records of actions taken.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of evidence of violations of Title 18, United States Code, Sections 2251(a) and 2251(e); and Title 18, United States Code, Section 2252A(a)(5)(B) for the user identified in Attachment A, pertaining to the following matters:

- (a) The production of images depicting child exploitation or child pornography
- (b) The identity of the person(s) who communicated with the user ID about matters relating to the trade of images depicting child exploitation or child pornography